



November 14, 2013

U.S. EPA
HQ FOIA Operations Staff (2822T)
Ariel Rios Building
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460

RE: **FOIA request for Registered Establishment Information**

Dear FOIA Staff:

Bayer CropScience (Bayer) would like to request information related to pesticide producing and device producing facilities registered with the U.S. Environmental Protection Agency (EPA). Bayer intends to use this information to for compliance purposes (*i.e.* to verify registration status of tolling establishments contracted by Bayer). This will ensure Bayer complies with all provisions of FIFRA, but will also aid in avoiding delays when sourcing of new products is needed.

Bayer CropScience
RTP
P. O. Box 12014
RTP, NC 27709
Tel. 919 549-2000

Bayer is requesting the full data set allowed for distribution for production year 2012 corresponding to data received by the agency by March 1, 2013.

This download should include, but not be limited to the following reports which have been previously released to Bayer:

1. Printout titled "Pesticide Report":

- a. Product Number
- b. Establishment Number
- c. Establishment Name
- d. Establishment Address (including City, State, and Postal Code)
- e. Product Name
- f. Product Market
- g. Product Type
- h. Product Use
- i. Product Class

2. Printout titled "Pesticide Production and Distribution Report"

- a. Production Report Summary
- b. Establishment Number
- c. Company Name
- d. Mailing Address (including City, State, and Postal Code)
- e. DUNS Number
- f. Site Address (including City, State/Province, Country, and Postal Code)
- g. EPA Region number

3. Printout titled "Company Index Report"

- a. EPA Establishment Number
- b. Establishment Name
- c. Establishment Site and Mail Address
- d. Date Created
- e. Date Updated
- f. Establishment Phone Number
- g. Company Number
- h. DUNS number
- i. Company Name
- j. Company Site and Mailing Address
- k. Date Created
- l. Date updated
- m. Company Phone Number

Data for these printouts should include all EPA Establishment numbers, foreign and domestic, active and inactive. Bayer anticipates that these fields should correspond to EPA's Pesticide Production report form (3540-16) boxes 1-27 for the reporting facility, and 28-35 for each product reported under this facility for the 2012 calendar year. Additionally, Bayer expects that information submitted to the agency for the registration of the facility using EPA's 3540-8 form will also be included in this report for each company, and for each facility registered by that company.

Bayer does not feel that information requested is protected under FIFRA Section 10 (Confidential Business Information), as we are not requesting actual production information, only information which has been released to Bayer in the past.

Bayer requests that the information be provided in electronic format, in a spreadsheet application.

Bayer is willing to incur up to \$500.00 in administrative fees to process this request. Should this fall out of line with the projected workload, please contact Bayer at any time to discuss.

Information requested may be sent to the following address:

Bayer CropScience
State Regulatory and Documentation Services
Attn: S. Gerret Van Duyn
2 T.W. Alexander Dr.
Research Triangle Park, NC 27709

Bayer CropScience appreciates the Agency's help in this regard, and should you need, please contact Gerret Van Duyn with any questions or concerns at (919) 549-2914, or via e-mail at: gerret.vanduynd@bayer.com.

Best Regards,

A handwritten signature in black ink, reading "S. Gerret Van Duyn". The signature is written in a cursive, flowing style.

Gerret Van Duyn
Compliance Manager
State Regulatory and Documentation Services
919-549-2914